

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

KRISTINA D. WOOD

PLAINTIFF

VS.

CIVIL ACTION NO. 3:15-cv-451-CWR-FKB

MAGEE COMMUNITY CARE CENTER, LLC  
d/b/a HILLCREST NURSING CENTER

DEFENDANT

**JOINT MOTION TO CONTINUE TRIAL AND  
AMEND THE SCHEDULING ORDER**

Plaintiff Kristina D. Wood (“Wood” or “Plaintiff”) and Defendant, Magee Community Care Center, LLC d/b/a Hillcrest Nursing Center (“Hillcrest” or “Defendant”), and file this Joint Motion to Continue Trial and to Extend Scheduling Order Deadlines, and in support thereof, state as follows:

1. The Complaint in this action was filed by the Plaintiff on June 18, 2015. According to the Scheduling Order, the discovery deadline is April 19, 2016 and the dispositive motion deadline is May 3, 2016. Trial is set for the two-week jury term beginning on October 3, 2016.

2. The parties need an extension of the discovery deadline in order to conclude and complete discovery in this action, and an extension of the motion deadline. Previously, the parties jointly moved for an extension of the discovery and dispositive motion deadline [Doc. 16.] and have been informed by the magistrate that the extension of the discovery and dispositive motion deadlines will require that the trial of this case currently set for the jury term beginning on October 3, 2016. [Doc. 17.]

3. Scheduling issues, discovery conducted to date, and the trial calendar of the attorneys of record have made this requested extension necessary.

4. The Plaintiff and Defendant desire, by agreement, to extend the discovery deadline and dispositive motion deadlines by two (2) months, that the trial of this matter be continued, and that the Scheduling Order be amended to extend the other relevant deadlines as necessary. Specifically, the parties request that the deadlines be extended as follows: discovery deadline until June 20, 2016; dispositive motion deadline of July 8, 2016.

5. No request for an extension of the trial has been filed previously.

6. This motion is not interposed for purposes of delay, but rather so that the interests of justice and judicial economy may be served.

7. Given the straightforward nature of this motion, the Parties respectfully request to be relieved of the requirement to submit a supporting memorandum pursuant to L. U. Civ. R. 7(b) (4).

WHEREFORE, the Parties request that the Court amend the Scheduling Order to continue trial, extend the Discovery Deadline to June 20, 2016, and the Dispositive Motion Deadline to July 8, 2016, and that this Court grant such other, further and different relief as this Court deems fair and just.

Respectfully submitted, this the 20<sup>th</sup> day of April, 2016.

**MAGEE COMMUNITY CARE CENTER, LLC**  
**d/b/a HILLCREST NURSING CENTER**  
Defendant

BY: /s/ Robin Banck Taylor  
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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served via the Court's Electronic Filing System upon the following:

Louis H. Watson, Jr.  
Nick Norris  
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Jackson, MS 39216-4972

**ATTORNEYS FOR PLAINTIFF**

This, the 20<sup>th</sup> day of April, 2016.

/s/ Robin Banck Taylor  
Robin Banck Taylor

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